

County Civil

Case Number

1177115

Court

All

Status

-All

File Date (From)

MM/DD/YYYY



File Date (To)

MM/DD/YYYY



SEARCH

CLEAR

☒ Party ☐ Attorney ☐ Company

Last Name

First Name

Bar Card Number

File Date (From)

MM/DD/YYYY



File Date (To)

MM/DD/YYYY



SEARCH

CLEAR

13 Record(s) Found.

Case

File Date

Type
Desc

Subtype

Style

Status

Judge

Cou



1177115	10/29/2021	OTHER INJURY OR DAMAGE	JOHN GARCIA,CLAUDIA TURCIOS,A. L.,N. L. VS HARRIS COUNTY,ED GONZALEZ,DEPUTY PAMELA WEBSTER,DEPUTY V ESQUEDA,LT CLOSLEY	Open	JIM KOVACH	2
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Event Date	Event Desc	Comments	Pgs
12/21/2021	Original Petition Citation Issued	M/O ATTY	Original Petition Citation 1
12/21/2021	Original Petition Citation Issued	M/O ATTY	Original Petition Citation 1
12/21/2021	Original Petition Citation Issued	M/O ATTY	Original Petition Citation 1
12/21/2021	Original Petition Citation Issued	M/O ATTY	Original Petition Citation 1
12/21/2021	Original Petition Citation Issued	M/O ATTY	Original Petition Citation 1
12/16/2021	Order of Transfer (accepted by Judge)		Order of Transfer (Recusal) 1
			Order of Transfer (accepted by Judge) 2
11/04/2021	Citation to Be Issued		POS-Deputy Pamela Webster (1).pdf 1
11/04/2021	Citation to Be Issued		POS-Lt Closley (1).pdf 1
11/04/2021	Citation to Be Issued		POS-Harris County (1).pdf 1
11/04/2021	Citation to Be Issued		POS-Ed Gonzalez (1).pdf 1
11/04/2021	Citation to Be Issued		POS-Deputy V Esqueda (1).pdf 1
10/29/2021	eFile Original Petition	Petition	JOHN GARCIA-Petition (2).pdf 11

10/29/2021 Original Petition (OCA)



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OF HARRIS COUNTY, TEXAS

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and as next friend for minors A.L. and N.L.

4. Defendant, Harris County, is a municipal corporation located in the State of Texas and incorporated under the laws of the State of Texas and is located within the boundaries of the Southern District of Texas. It may be served with citation through the County Judge Lina Hidalgo she may be served at 1001 Preston St., Suite 911, Houston, Texas 77002, or wherever she may be found., or wherever it may be found.

5. Defendant, Ed Gonzalez, is an individual who may be served with a citation at 1200 Baker St., Houston, Texas 77002 in Harris County, or wherever he may be found. Ed Gonzalez is being sued in his individual capacity and at all times relevant to this case acted under the color of law.

6. Defendant Deputy Pamela Webster is an individual who may be served with a citation at 1200 Baker St., Houston, Texas 77002 or wherever she may be found. Webster is being sued in her individual capacity and at all times relevant to this case acted under the color of law.

7. Defendant, Deputy V Esqueda is an individual who may be served with a citation at her place of employment located at 1200 Baker St., Houston, Texas 77002, or wherever she may be found. Esqueda is being sued in his individual capacity and at all times relevant to this case acted under the color of law.

8. Defendant, Lt Closley is an individual who may be served with a citation at 1200 Baker St., Houston, Texas 77002 or wherever he may be found. Closely is being sued in his

individual capacity and at all times relevant to this case acted under the color of law.

III. JURISDICTION AND VENUE

9. Jurisdiction is proper in this Court because the damages sought by Plaintiffs exceed this Court's minimal jurisdictional limits, and the parties to this lawsuit are all subject to jurisdiction in the State of Texas. *See* Tex. R. Civ. P. 47(b). This Court has jurisdiction over Defendants, because they are citizens of the State of Texas, and they engaged in the concerted wrongful activity, which is the subject of this lawsuit. Further, Harris County does business in the State of Texas and is therefore subject to the jurisdiction of the State of Texas.

10. Each Plaintiff seeks monetary relief not more than \$250,000.00, including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorneys' fees, plus all other relief to which Plaintiffs deem themselves entitled. *See* Tex. R. Civ. P. 47(c), (d).

11. The venue is proper in Harris County, Texas, because all or a substantial part of the events or omissions giving rise to Plaintiff's claims occurred in Harris County. *See* Tex. Civ. Prac. & Rem. Code § 15.002(a)(1).

IV. FACTUAL BACKGROUND

Esqueda's Excessive Use of Force and Illegal Detention, and Violation of Due Process

12. This suit arises from the excessive use of force and wrongful detention of John Garcia, and A.L. by Officer Esqueda.

13. On November 8, 2019, Esqueda and Webster arrived at White Berry Court in

Humble TX.

14. Esqueda terrorized Claudia Turcios, and N.L. and threatened them with extreme violence. She ultimately used excessive force and unlawfully detained John Garcia and A. L.

15. Lt. Closely was made aware of the incident but failed to discipline Esqueda or Webster for her failure to discipline.

16. Esqueda warned Garcia to never call the police again or we will take your family, in violation of due process.

Due To The Harris County's Failure To Train, Failure To Discipline, And Failure To Supervise, Esqueda And Webster, John Garcia, And His Family's Constitutional Rights To Be Free From Illegal Search And Seizure And Excessive Force.

17. As a result of the actions of Ed Gonzalez, and Lt. Closley his failures to train, supervise, discipline, and implement policies to prevent foreseeable constitutional violations by Webster, and Esqueda, the Garcia Family were attacked, and detained.

18. They suffered both physical and mental injuries.

V. CAUSES OF ACTION

Fourteenth Amendment Due Process and Fourth Amendment Excessive Force, and Illegal Seizure.

19. Plaintiffs incorporate by reference all paragraphs contained herein.

20. Webster, and Esqueda, deprived John Garcia and his minor son, of their Fourth Amendment right to be free from the use of excessive force. Webster, and Esqueda,

deprived John Garcia and his minor son's right to be free from the use of excessive force when Esqueda grabbed the non-threatening Garcia and his minor son and placed them in handcuffs.

21. Webster failed to intervene to stop Esqueda from violating Mr. Garcia and his family's Fourth and Fourteenth Amendment right to be free from the use of excessive force and due process.

22. Harris County and its policymaker the Chief of Police Ed Gonzalez acted to violate John Garcia and his family's right to be free from excessive force. Harris County promoted, adopted, and promulgated a policy or custom of allowing its arresting deputies to utilize excessive force when arresting citizens and not interfering to prevent others from engaging in the use of excessive force, and based on the inadequate training and supervision of his officers by Ed Gonzalez and Lt. Closely. Harris County and its officials did deliberately or recklessly violate Plaintiff's civil rights under the color of law through the use of excessive force and unlawful detention against John Garcia, his minor son, and family, when Esqueda violently harassed them threatening to take their family and detaining John Garcia and his minor son, while Webster did nothing.

23. Ed Gonzalez as the Sheriff of Harris County was the official policy-maker of the County for Law enforcement purposes. He was sufficiently aware that his office's supervision, and training policies, were defective, incomplete, or routinely ignored by its

officers and other security officers to the extent that they facilitated or permitted the use of excessive force against other civilians in Baytown.

24. Ed Gonzalez's inactions promoted excessive force against John Garcia and his minor son and evidenced a deliberate indifferent practice and custom of excessive force within the Harris County's sheriff's department.

25. Ed Gonzalez is liable because he had a policy, procedure, or custom of ignoring open and obvious constitutional violations, namely the excessive force and unlawful detention.

26. The Garcia family had a right to due process of the law. That right was violated by Esqueda and Webster when they sought to arrest them without reason.

27. The plaintiffs had not committed a crime when Esqueda and Webster sought to arrest them. Therefore, this unlawful detention was a gross violation of the Plaintiffs' right not to have their liberty deprived without due process.

28. Due to Harris County's customs, policies, and practices, Defendants proximately caused plaintiffs' injuries.

29. Defendants' misconduct described herein was objectively unreasonable and undertaken with willfulness and reckless indifference to his rights.

30. In addition, the misconduct and excessive force described herein "shocks the conscience" because citizens not accused or suspected of crimes should not be deprived of their liberty and should be free of abuse by the hands of Baytown police officers.

Monell Liabilities

31. Plaintiffs incorporate by reference all paragraphs contained herein.

32. Harris County's customs, policies, and practices encourage constitutional violations by its officers. The deliberately indifferent defacto policies and practices implemented were the moving force behind the unlawful arrest and excessive force the Plaintiffs suffered. Harris County's failure to train and deficient training, supervision, control, and discipline of its officers resulted in constitutional violations of the Plaintiffs. Thereby leading the Baytown police officers to believe their actions will never be meaningfully scrutinized.

33. Although the plaintiffs need not name the actual policymaker at the pleading stage, they believe that Ed Gonzalez is the policymaker of Harris County for law enforcement purposes. He issues orders and has full policymaking authority through the city council. Through discovery, plaintiffs will identify with certainty the applicable policymaker. Harris County's action, inaction, policies, practices, and customs related to the conduct by its officers directed to Plaintiffs were moving forces behind the violations of their constitutional rights and damages suffered.

34. There were various instances of excessive force and wrongful arrest previously and after Plaintiff's cause of action, causing injuries or death. As such, Baytown and Ed Gonzalez ratified actions as their own and implemented policies, practices, customs, and procedures with deliberate indifference to the constitutional rights of citizens and others within Baytown, Texas.

Unlawful Wrongful Arrest and Malicious Prosecution Illegal Seizure under 4th Amendment

35. Plaintiffs incorporate by reference all paragraphs contained herein.

36. As described in the preceding paragraphs Esqueda and Webster fabricated evidence by providing false affidavits to support criminal charges and the prosecution of the Plaintiffs. Additionally, Esqueda and Webster provided perjured evidence to the District Attorney that John Garcia and his family were interfering with public duties because they were inquiring about their friend was being arrested, engaging in speech only. Esqueda and Webster did so with malicious intent seething anger directed toward Plaintiffs with a knee to the face and violent shove into a car and pinned down.

37. Esqueda and Webster initiated criminal charges without probable cause that resulted in the violation of John Garcia and his family's rights pursuant to the Fourth Amendment and Fourteenth Amendment, specifically those related to improper and malicious prosecution, wrongful initiation of legal process (criminal prosecution), fabrication of evidence to support the illegal arrest, and the right to due process.

Failure to train or supervise

38. Plaintiffs incorporate by reference all paragraphs contained herein.

39. At all times relevant hereto, all of the Plaintiff's inalienable and fundamental liberty interests were protected by the Constitution.

40. Ed Gonzalez violated John Garcia and his family's constitutional rights by failing to discipline, train or supervise Esqueda and Webster. Instead, he upheld their actions with deliberate indifference after his officers violated the constitutional rights of others, leading up to the violation of the constitutional rights of John Garcia and his family.

41. Esqueda detained a non-combative Garcia and his minor son.

42. Ed Gonzalez failed to train or supervise Esqueda and Webster in the use and application of force, along with de-escalation techniques.

43. Additional training or supervision, or discipline by Harris County and Ed Gonzalez would have prevented John Garcia and his family's constitutional rights from being violated, damages and injuries.

VI. DAMAGES

44. Plaintiffs seek all damages allowed by law due to the aforementioned, forming the basis for each of his causes of action. Plaintiffs request damages within the jurisdictional limits of the Court, including:

- a. Physical pain and mental anguish;
- b. Loss of earning capacity and lost wages;
- c. Physical impairment;
- d. Out-of-pocket economic losses.
- e. other expenses related to arrest and prosecution of Isaiah Phillips and John Garcia; and
- f. exemplary/punitive damages.

- g. Plaintiff's reasonable and necessary attorneys' fees;
- h. Costs of court;
- i. Pre-judgment and post-judgment interest at the highest rates allowable by law;
- j. relief against Defendants barring the use of strikes to the head altogether and barring the use of body slams and taser guns in non-threatening situations; and
- k. For such other and further relief, both general and special, at law and in equity, to which Plaintiffs may show themselves entitled.

45. The damages sustained by Plaintiffs were proximately caused by Defendants as set forth herein.

46. Plaintiffs respectfully request that the Court and jury determine the amount of the loss Plaintiffs have incurred in the past and will incur in the future.

47. Certain elements of damages provided by law that the Plaintiffs are entitled to have the jury in this case separately consider determining the sum of money for each element that will fairly and reasonably compensate the Plaintiff.

VII. ATTORNEYS FEES

48. After prevailing herein, Plaintiffs are entitled to recover reasonable and necessary attorneys' fees and costs to enforce their constitutional rights under 42 U.S.C. §§ 1983 and 1988 from Defendants.

VIII. REQUEST FOR DISCLOSURE

49. Under Texas Rule of Civil Procedure 194.2, Plaintiffs request that Defendants disclose the information or material described in all Texas Rule of Civil Procedure 194.2 (a)-(1).

IX. JURY DEMAND

50. Pursuant to Texas Rule of Civil Procedure 216, Plaintiffs respectfully request and demand a trial by jury.

X. PRAYER

51. Plaintiffs pray that a judgment against Defendants for actual damages shown and proven at trial, for prejudgment, post-judgment interest, for costs of court, and all other relief, legal and equitable, to which he is entitled.

Respectfully submitted,

By: /s/ U.A. Lewis

U.A. Lewis

The Lewis Law Group

SBN: 24076511

FBN: 1645666

P.O. Box 27353, Houston, TX 77227

Phone: (713) 570-6555 Fax: (713) 581-1017

myattorneyatlaw@gmail.com

Attorney for Plaintiffs

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

U.A. Lewis on behalf of U.A. Lewis
Bar No. 24076511
myattorneyatlaw@gmail.com
Envelope ID: 58680620
Status as of 10/29/2021 3:04 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
U.A. LEWIS		MYATTORNEYATLAW@GMAIL.COM	10/29/2021 2:37:20 PM	SENT
U.A. Lewis		office@thelewislaw.com	10/29/2021 2:37:20 PM	SENT



1177115

Harris County - County Civil Court at Law No. 4

Case 4:22-cv-00198 Document 1-5 Filed on 01/20/22 in TXSD Page 16 of 33

11/4/2021 10:56 AM

Teneshia Hudspeth

County Clerk

Harris County

OFFICE OF TENESHIA HUDSPETH

COUNTY CLERK, HARRIS COUNTY, TEXAS

COUNTY CIVIL COURTS DEPARTMENT

Docket No. 1177115JOHN GARCIA, ET AL.,

Plaintiff

vs.

County Civil Court

At Law No. 4DEPUTY V ESQUEDA

Defendant

☐ Alias Citation☐ Amended Citation

(Address for service):

1200 Baker St., Houston, Texas 77002☐ Rule 106 Citation☐ Abstract of Judgment☐ Writ of Execution☐ Writ of Execution *and* Order of Sale☐ Writ of Possession☐ Certificate of Dormant Judgment☐ Certificate of Transfer☐ Certificate of No Appeal☐ Bill of Costs☐ Jury Fee☐ Deposit into Registry of Court☒ Other Services ORIGINAL CITATION1**REQUEST MADE BY**(Name) U.A. LEWIS, 24076511(Address) 99 DETERING SUITE 104, HOUSTON, TX 77007(Phone Number) 713-570-6555

(Zip Code)

Request is to be:☒ Mailed☐ Picked up by: _____

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U.A. Lewis on behalf of U.A. Lewis
Bar No. 24076511
myattorneyatlaw@gmail.com
Envelope ID: 58851843
Status as of 11/4/2021 12:15 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
U.A. LEWIS		MYATTORNEYATLAW@GMAIL.COM	11/4/2021 10:56:25 AM	SENT
U.A. Lewis		office@thelewislaw.com	11/4/2021 10:56:25 AM	SENT



1177115 Harris County - County Civil Court at Law No. 4
Case 4:22-cv-00198 Document 1-5 Filed on 01/20/22 in TXSD Page 18 of 33
OFFICE OF TENESHIA HUDSPETH

COUNTY CLERK, HARRIS COUNTY, TEXAS
COUNTY CIVIL COURTS DEPARTMENT

11/4/2021 10:56 AM
Teneshia Hudspeth
County Clerk
Harris County

Docket No. 1177115

JOHN GARCIA, ET AL.,

Plaintiff

vs.

County Civil Court

At Law No. 4

ED GONZALEZ

Defendant

☐ Alias Citation

☐ Amended Citation

(Address for service):

1200 Baker St., Houston, Texas 77002

☐ Rule 106 Citation

☐ Abstract of Judgment

☐ Writ of Execution

☐ Writ of Execution and Order of Sale

☐ Writ of Possession

☐ Certificate of Dormant Judgment

☐ Certificate of Transfer

☐ Certificate of No Appeal

☐ Bill of Costs

☐ Jury Fee

☐ Deposit into Registry of Court

☒ Other Services **ORIGINAL CITATION**

1

REQUEST MADE BY

(Name) U.A. LEWIS, 24076511

(Address) 99 DETERING SUITE 104, HOUSTON, TX 77007

(Phone Number) 713-570-6555

(Zip Code)

Request is to be:

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1177115 Harris County - County Civil Court at Law No. 4
Case 4:22-cv-00198 Document 1-5 Filed on 01/20/22 in TXSD Page 20 of 33
OFFICE OF TENESHIA HUDSPETH

COUNTY CLERK, HARRIS COUNTY, TEXAS
COUNTY CIVIL COURTS DEPARTMENT

11/4/2021 10:56 AM
Teneshia Hudspeth
County Clerk
Harris County

Docket No. 1177115

JOHN GARCIA, ET AL.,

Plaintiff

vs.

County Civil Court

At Law No. 4

HARRIS COUNTY,

Defendant

☐ Alias Citation

☐ Amended Citation

(Address for service): c/o COUNTY JUDGE LINA HIDALGO

1001 Preston St., Suite 911, Houston, Texas 77002

☐ Rule 106 Citation

☐ Abstract of Judgment

☐ Writ of Execution

☐ Writ of Execution *and* Order of Sale

☐ Writ of Possession

☐ Certificate of Dormant Judgment

☐ Certificate of Transfer

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☒ Other Services ORIGINAL CITATION

1

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(Zip Code)

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1177115 Harris County - County Civil Court at Law No. 4
Case 4:22-cv-00198 Document 1-5 Filed on 01/20/22 in TXSD Page 22 of 33
OFFICE OF TENESHIA HUDSPETH

COUNTY CLERK, HARRIS COUNTY, TEXAS
COUNTY CIVIL COURTS DEPARTMENT

11/4/2021 10:56 AM
Teneshia Hudspeth
County Clerk
Harris County

Docket No. 1177115

JOHN GARCIA, ET AL.,

Plaintiff

vs.

County Civil Court

At Law No. 4

LT. CLOSLEY

Defendant

☐ Alias Citation

☐ Amended Citation

(Address for service): _____

1200 Baker St., Houston, Texas 77002

☐ Rule 106 Citation

☐ Abstract of Judgment

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☒ Other Services ORIGINAL CITATION

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(Address) 99 DETERING SUITE 104, HOUSTON, TX 77007

(Phone Number) 713-570-6555 (Zip Code)

Request is to be:

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☐ Picked up by: _____

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Harris County - County Civil Court at Law No. 4

Case 4:22-cv-00198 Document 1-5 Filed on 01/20/22 in TXSD Page 24 of 33

11/4/2021 10:56 AM

Teneshia Hudspeth

County Clerk

Harris County

OFFICE OF TENESHIA HUDSPETH

COUNTY CLERK, HARRIS COUNTY, TEXAS

COUNTY CIVIL COURTS DEPARTMENT

Docket No. 1177115**JOHN GARCIA, ET AL.,**

Plaintiff

vs.

County Civil Court

At Law No. 4**DEPUTY PAMELA WEBSTER**

Defendant

☐ Alias Citation☐ Amended Citation

(Address for service):

1200 Baker St., Houston, Texas 77002☐ Rule 106 Citation☐ Abstract of Judgment☐ Writ of Execution☐ Writ of Execution *and* Order of Sale☐ Writ of Possession☐ Certificate of Dormant Judgment☐ Certificate of Transfer☐ Certificate of No Appeal☐ Bill of Costs☐ Jury Fee☐ Deposit into Registry of Court☒ Other Services **ORIGINAL CITATION**1**REQUEST MADE BY**(Name) U.A. LEWIS, 24076511(Address) 99 DETERING SUITE 104, HOUSTON, TX 77007(Phone Number) 713-570-6555

(Zip Code)

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U.A. Lewis on behalf of U.A. Lewis
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myattorneyatlaw@gmail.com
Envelope ID: 58851843
Status as of 11/4/2021 12:15 PM CST

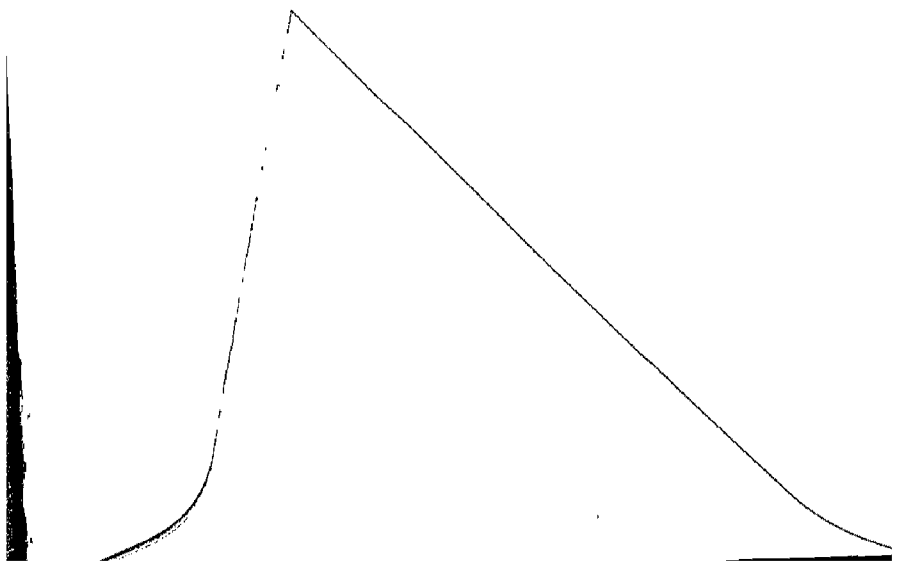
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TENESHIA HUDSPETH
COUNTY CLERK
POST OFFICE BOX 1525
HOUSTON, TEXAS 77251-1525

U.A. Lewis
The Lewis Law Group
PO BOX 27353
Houston, TX 77227

CAUSE NUMBER 1177115

John Garcia
Plaintiff
VS.
Harris County
Defendant

In The County Civil Court at Law No. 4

Harris County, Texas

ORDER OF TRANSFER

On 12/14/2021 upon the Court's consideration the Judge has and it is hereby

ORDERED,

☒ 1. Voluntarily recuses him/ herself.

☐ 2. Refused to recuse him/ herself.

☐ 3. Is automatically recused.



12/14/2021

JUDGE, County Civil Court at Law No. 4

Upon the assignment of the Division Presiding Judge, the above referenced, styled and numbered Cause is transferred to the County Civil Court of Law No. 2, Harris County, Texas.

Signed this 12/16/2021 day of _____, 2021.



DIVISION PRESIDING JUDGE

U.A. Lewis
The Lewis Law Group
PO BOX 27353
Houston, TX 77227

FILED
12/17/2021 8:53:43 AM
Teneshia Hudspeth
County Clerk
Harris County, Texas
krojas



OFFICE OF TENESHIA HUDSPETH
COUNTY CLERK, HARRIS COUNTY, TEXAS
COUNTY CIVIL COURTS DEPARTMENT

Docket Number: 1177115
Receipt Number: Date: Sheriff/Constable Fee: \$

JOHN GARCIA
Plaintiff
VS.
HARRIS COUNTY, ET AL
Defendant

In The County Civil Court at Law No. 2
201 Caroline #517
Houston, Tx 77002

THE STATE OF TEXAS
PLAINTIFF'S ORIGINAL PETITION CITATION

To: DEPUTY PAMELA WEBSTER
1200 BAKER ST.
HOUSTON, TEXAS 77002

Attached is a copy of petition.

This instrument was filed on the **29th day of October, 2021**, in the above cited cause number and court. The instrument attached describes the claim against you.

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the county clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org.

Issued and given under my hand and the seal of said court, at Houston, Texas, on this 21st day of December, 2021

(Seal)

Teneshia Hudspeth, County Clerk
County Civil Court at Law No. 2
201 Caroline, Suite 300
Harris County, Texas 77002

Matthew Simmons
Deputy County Clerk

Requested By: U A LEWIS
THE LEWIS LAW GROUP
PO BOX 27353
HOUSTON TX 77227



OFFICE OF TENESHIA HUDSPETH
COUNTY CLERK, HARRIS COUNTY, TEXAS
COUNTY CIVIL COURTS DEPARTMENT

Docket Number: 1177115
Receipt Number: Date: Sheriff/Constable Fee: \$

JOHN GARCIA
Plaintiff
VS.
HARRIS COUNTY, ET AL
Defendant

In The County Civil Court at Law No. 2
201 Caroline #517
Houston, Tx 77002

THE STATE OF TEXAS
PLAINTIFF'S ORIGINAL PETITION CITATION

To: DEPUTY V ESQUEDA
 1200 BAKER ST.
 HOUSTON, TEXAS 77002

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Issued and given under my hand and the seal of said court, at Houston, Texas, on this 21st day of December, 2021

(Seal)

Teneshia Hudspeth, County Clerk
County Civil Court at Law No. 2
201 Caroline, Suite 300
Harris County, Texas 77002

Matthew Simmons
Deputy County Clerk

Requested U A LEWIS
By: THE LEWIS LAW GROUP
 PO BOX 27353
 HOUSTON TX 77227



OFFICE OF TENESHIA HUDSPETH
COUNTY CLERK, HARRIS COUNTY, TEXAS
COUNTY CIVIL COURTS DEPARTMENT

Docket Number: 1177115
Receipt Number: Date: Sheriff/Constable Fee: \$

JOHN GARCIA
Plaintiff
VS.
HARRIS COUNTY, ET AL
Defendant

In The County Civil Court at Law No. 2
201 Caroline #517
Houston, Tx 77002

THE STATE OF TEXAS
PLAINTIFF'S ORIGINAL PETITION CITATION

To: ED GONZALEZ
 1200 BAKER ST.
 HOUSTON, TX 77002

Attached is a copy of petition.

This instrument was filed on the **29th day of October, 2021**, in the above cited cause number and court. The instrument attached describes the claim against you.

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the county clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org.

Issued and given under my hand and the seal of said court, at Houston, Texas, on this 21st day of December, 2021

(Seal)

Teneshia Hudspeth, County Clerk
County Civil Court at Law No. 2
201 Caroline, Suite 300
Harris County, Texas 77002

Matthew Simmons
Deputy County Clerk

Requested U A LEWIS
By: THE LEWIS LAW GROUP
 PO BOX 27353
 HOUSTON TX 77227



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To: HARRIS COUNTY
C/O LINA HIDALGO
1001 PRESTON ST., SUITE 911
HOUSTON, TEXAS 77002

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